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NOV 13 2009

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
ROOMY KAHN,
Defendant.

CR 01-20029 JW

Stipulation and ~~PROPOSED~~ Order Re:
Motion to Unseal File
AS MODIFIED
Date: none
Time: none
Courtroom: 8, Hon. James Ware

On Friday, November 6, the government learned that the Court, in response to a motion by San Jose Mercury News ("Movant") to unseal the file in the above-captioned case, had issued an Order to Show Cause ("OSC") why such relief should not be granted. The OSC directed the government to respond today, November 9. In order to allow time adequately to consider and respond to this matter, the government respectfully requests an extension of the date by which it must file a responsive pleading from November 9 through Friday, November 13, 2009.

The government has discussed this proposed extension of time with James Chadwick,

cc: *RAUSA*

1 counsel for Movant. Movant does not object to the government's request for an extension to
2 November 13; however, if the Court grants the government's request, Movant seeks an extension
3 of time by which it must file its reply brief, if any, from November 13 through November 19.
4

5 DATED: November 9, 2009

6 Respectfully submitted,

7 JOSEPH P. RUSSONIELLO
8 United States Attorney

9 

10 THOMAS E. STEVENS
11 Assistant United States Attorney

12 PROPOSED ORDER

13 The Court having considered the government's motion to extend time to respond to the
14 motion of San Jose Mercury News to unseal the file in this case, and good cause appearing
15 therefor, IT IS HEREBY ORDERED THAT:

16 1) The government shall file its responsive pleading on or before November 13;

17 2) Movant shall file its reply, if any, on or before November 19.

18 3) Motion of Raj Rajaratnam for Intervention
19 is continued to Dec 7 2009 @ 1:30 PM.

20 IT IS SO ORDERED.

21 The court resets the OSC and hearing date
22 Dated: November 15, 2009 from November 23, 2009 to December
23 7, 2009 @ 1:30 PM

24 
25 JAMES WARE
26 United States District Court Judge
27
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